

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

EVELIO DROZ RAMOS
AUREA ESTHER FRANCO DE DIAZ

DEBTORS

CASE NO. 14-08190-ESL

CHAPTER 13

**DEBTORS' REPLY TO TRUSTEE'S MOTION TO DISMISS, DOCKET #26,
TO THE HONORABLE COURT:**

NOW COME, EVELIO DROZ RAMOS and AUREA ESTHER FRANCO DE DIAZ,
debtors in the above captioned case through the undersigned attorney, and very respectfully state and pray as follows:

1. On March 12, 2015, the Chapter 13 Trustee has filed a motion to dismiss, docket #26, basically alleging that the debtors have failed to comply with the Bankruptcy Code since they have failed to resolve or act upon issues identified by the Trustee at the meeting of creditors.

2. The debtors hereby respectfully submit that on March 13, 2015, they filed an amended Plan and amended schedules "A" and "C" in order to cure the objection raised by the Trustee in his report on confirmation, docket #25.

3. Furthermore, the debtors respectfully submits that on March 30, 2015, they provided to the Trustee copy of complaint for the civil case filed in Superior Court in Comerio and evidence of rental income and mortgage payments, in order to cure the objection raised by the Trustee in his report on confirmation, docket #25.

4. Moreover, regarding the problem with PR Assets, the debtors will be informing to the Trustee the status of this proceeding as soon as they correct this situation.

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WHEREFORE, debtors respectfully request the Court deny Trustee's motion to dismiss, docket #26.

I CERTIFY that on this same date a copy of this notice was sent by the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the debtors, Evelio Droz Ramos and Aurea Esther Franco de Diaz, to the address of record: PO Box 3652 Bayamon, PR 00958.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico this 1st day of April, 2015.

/s/ Roberto Figueroa Carrasquillo
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